

ORIGINAL

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

Margaret Rona Lee Flaherty, pro se
P. O. Box 1308
Kapaau, HI 96755-1308
Telephone: (808) 889-1004
Email: microflah@yahoo.com

FEB 17 2009

at 7 o'clock and 10 min. P.M. *P. g*
SUE BEITIA, CLERK

United States District Court for the
District of Hawaii

UNITED STATES OF AMERICA)	Civil Action No. CV08-00493 SOM KSC
)	DEFENDANT Margaret Rona Lee Flaherty
Plaintiff,)	INITIAL DISCLOSURES PURSUANT TO
)	FED. R. CIV. PROC. RULE 26(a)i
vs.)	CERTIFICATE OF SERVICE
)	
Margaret Rona Lee Flaherty)	
)	
Defendant.)	TRIAL DATE: February 23, 2010
)	
_____)	

DEFENDANT Margaret Rona Lee Flaherty

INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. PROC. RULE 26(a)

COMES NOW, Defendant Margaret Rona Lee Flaherty, pro se and pursuant to Rule 26 (a) Federal Rules of Civil Procedure ("FRCP") and Local Rule 26.1 (a) Rules of the United States District Court for the District of Hawai'i ("Local Rules"), hereby submit her initial disclosures as follows:

I. PERSONS WITH PERSONAL KNOWLEDGE

The following identified persons have knowledge of discoverable information relevant to the claims of Defendant Margaret Rona Lee Flaherty.

1. Plaintiff United States of America c/o Jeremy Hendon, Esq. U. S. Department of

- Justice, P.O. Box 683, Ben Franklin Station, Washington DC, 20044-0683,
Telephone: (202) 353-2466.
2. Defendant Michael William Flaherty, P.O. Box 1308, Kapa'au, Hawai'i,
Telephone: (808) 889-1004.
 3. Defendant Margaret Rona Lee Flaherty, P. O. Box 1308, Kapa'au, Hawai'i 96755,
Telephone: (808) 889-1004.
 4. Defendant Bank of Hawaii c/o Caroline S. Otani, Esq. Rush Moore LLP, 737
Bishop Street, Suite 2400, Honolulu, Hawaii 96813 Telephone (808) 521-0432.
 5. All John and Jane Doe's, who have ever accessed my Individual Master File
at The Internal Revenue Centers at any and all locations, in any State of the
United States of America.
 6. John or Jane Doe, et al, Carolyn Levy, Tax Technician, Manager,
Examination Operations, Employee I.D. No 0363000000, Internal Revenue
Service, P. O. Box 309011, AMC-8236, Memphis, TN 38130-9011
 7. John or Jane Doe, et al, David Alito, Field Director, Compliance Services,
Memphis Service Center, P. O. Box 309011, AMC-8236, Memphis, TN
38130-9011.
 8. Alan Ochiae, Revenue Officer, Employee I. D. No. 91-05648, Internal
Revenue Service, Lanihau Professional Building, 75-5591 Palani Rd. Suite
2007, Kailua-Kona, HI. 96740 (808) 329-5781
 9. John or Jane Doe, et al, LeeAnn Imanaka, Group Manager, Address
Unknown, (808) 539-1517
 10. John or Jane Doe, et al, Dora Zamora, Disclosure Specialist, I.D. No. 89-
01017, Internal Revenue Service, Disclosure Office—Fresno Campus, 5045
E. Butler Avenue. M/S 22491, Fresno, CA 93727; (559)253-4943
 11. John or Jane Doe, et al, C. Inman, Internal Revenue Service Disclosure Office,
24000 Avila Rd., Laguna Nigel, CA 92677
 12. John or Jane Doe, et al, Dorsey Kozarovich, Disclosure Manager, Disclosure
Office 13. Internal Revenue Service Disclosure Office 13, 24000 Avila Rd. M/S
2201, Laguna Nigel, CA 92677
 13. John or Jane Doe, et al, Karen Berrie, Disclosure Specialist, ID #0245979, Internal
Revenue Service Disclosure Office 13, 24000 Avila Rd. M/S 2201, Laguna Nigel,
CA 92677. (949)389-4379
 14. Laura Takahashi, Delinquent Tax Collection Assistant II (DTCA II), c/o Kristie Cruz
Chang, Deputy Attorney General, 425 Queen Street, Honolulu, Hawaii 96813,

Telephone: (808) 586-1470.

15. Alan Nishigaya, Delinquent Tax Collection Assistant III (DTCA III), c/o Kristie Cruz Chang, Deputy Attorney General, 425 Queen Street, Honolulu, Hawaii 96813, Telephone: (808) 586-1470.
16. Lynne Kaneta, Tax Collector, c/o Kristie Cruz Chang, Deputy Attorney General, 425 Queen Street, Honolulu, Hawaii 96813, Telephone: (808) 586-1470.
17. Jerry Ebesu, Document Processing Operation Manager, c/o Kristie Cruz Chang, Deputy Attorney General, 425 Queen Street, Honolulu, Hawaii 96813, Telephone: (808) 586-1470.
18. Thomas Clarke, AARP Tax-Aide S64053106 and S64053107, 75-217 Nani Kailua Dr. #141, Kailua-Kona, HI 96740. Telephone (808) 334-1301.
19. G. Daniel Keahy III, Esq. Internal Revenue Service, formerly Kailua-Kona. Last known address: Honolulu, Hawaii.
20. Defendant reserves the right to identify other persons who may have knowledge of discoverable information relevant to the claims and the defenses of the parties.

II DOCUMENTS, DATA COMPILATIONS, TANGIBLE THINGS

Defendant Margaret Rona Lee Flaherty is in possession, custody and control of nearly all documents, data compilations and tangible things to support her defenses. Any missing information can be retrieved through this action.

Categories of documents, data compilations and tangible things include tax returns, correspondence with Plaintiff's Client, The Internal Revenue Service, An Agency of THE UNITED STATES GOVERNMENT.

Defendant Margaret Rona Lee Flaherty demands that THE UNITED STATES GOVERNMENT show a procedurally correct signed and dated assessment from the current Internal Revenue Manual, 2009 IRS Assessment Rules 3.17.63.22.6 (10-01-2005) (Web access @ IRS.GOV, click on I.R.M.)

III DAMAGES

Defendant Margaret Rona Lee Flaherty is not claiming any damages at this time; therefore, there is no computation of any category of damages available for inspection or copying.

Respectfully submitted

Margaret Rona Lee Flaherty,
P. O. Box 1308
Kapa'au, HI. 96755-1308
Telephone: (808) 889-1004
Email: microflah@yahoo.com


/s/ Margaret Rona Lee Flaherty

CERTIFICATE OF SERVICE

I, Margaret Rona Lee Flaherty, certify by my signature above that a copy of the foregoing was delivered by email this February 17, 2009 to:

Jeremy N. Hendon
US Department of Justice - Tax Division
PO Box 683
Ben Franklin Station
Washington, DC 20044-0683
Email: Jeremy.Hendon@usdoj.gov

Curtis C. Smith
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683 Ben Franklin Station
Washington, DC 20044-0683
Email: Curtis.C.Smith@usdoj.gov

EDWARD H. KUBO JR., Esq. (2499)
United States Attorney
District of Hawaii

HARRY YEE (3790)
Asst. United States Attorney
Room 6100, PJKK Federal Building
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
E-mail: Harry.Yee@usdoj.gov

Kristie Cruz Chang
Deputy Attorney General
Tax Division
425 Queen Street
Honolulu, Hawaii 96813
Email: Kristie.C.Chang@hawaii.gov

Carolyn S. Otani, 5854-0
737 Bishop Street, Suite 2400
Honolulu, Hawaii 96813
Telephone: (808) 521-0432
Email: cotani@rmhawaii.com